

Debra Allison - 8/6/2015

1 A. They are aware of.

2 Q. How do you make the inmates aware of the level of
3 arsenic in the that you're giving them as this measure designed
4 to protect them in theory?

5 A. There is a posting that is posted for all the
6 inmates.

7 Q. Where is that posting?

8 A. It's on the outside of the medical.

9 Q. Okay. There is a posting alerting them that the
10 level of arsenic in the water is X-parts per -- there's a
11 posting that says what the arsenic level is?

12 A. Yes.

13 Q. Okay. Did you play a role in putting up that sign?

14 A. No.

15 Q. Did you play a role in evaluating that risk?

16 A. No.

17 Q. Okay. Do you know who did?

18 A. That's between Facilities and Environmental.

19 Q. Okay. If it is true -- if it is true that the
20 arsenic level is not safe, what -- would the training change in
21 any way at the Pack Unit with regards to measures to protect
22 inmates from heat?

23 A. If the arsenic level in the water was unsafe, this
24 unit would be shut down. We would not be here. I drink the
25 same water the inmates do. I drink it every day while I work.

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Plaintiffs' Preliminary Injunction

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1 Q. Do you access to bottled water?

2 A. Yes.

3 Q. Do you bring in bottle water?

4 A. Yes, I do.

5 Q. Do most of the correctional offers bring in bottled
6 water?

7 A. That's up to them. I don't know.

8 Q. Does bottle water taste better than the water you
9 would drink out of this water fountain right here?

10 A. That's personal preference.

11 Q. It taste a lot better to me. Does it taste better to
12 you?

13 A. I couldn't say one way or the other. I drink the
14 water when I'm at lunch. I drink bottle water when I'm in my
15 office because I don't have access to the water.

16 Q. Sure.

17 Does anybody --

18 MS. BURTON: Objection. Objection to the
19 sidebar and the sarcastic comment.

20 MR. EDWARDS: It's not sarcasm. It's
21 dead-honest true.

22 MS. BURTON: Sure. To act like she's not
23 telling the truth? That's improper and belittling.

24 MR. EDWARDS: That's so far from true, Cynthia.

25 MS. BURTON: The way that you're looking her,

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